Service Associates, Inc.

160 East Main Street Brevard, North Carolina 28712 828.885.2832 – 828.885.5023 FAX

November 27, 2007

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

CC Docket No. 02-06 CC Docket No. 96.45

Re: Request for Review of

USAC-SLD Funding Commitment Decisions

To whom it may concern:

This Request for Review is filed on behalf of the applicant. My contact information is as follows:

Tom Traywick, Sr. Compliance Analyst Service Associates, Inc. East Main Professional Plaza 160 East Main Street Brevard, NC 28712 tttraywick@serviceassoc.com 828.885.2832 828.885.5023 FAX

Applicant

Contact:

Lexington County School District 2

Attn: Dr. Carl Lam, Director of Technology

715 Ninth Street

West Columbia, SC 29169

lexington2@serviceassociates.com

(803) 739-4084

Service Associates, Inc. is an E-rate support services company providing services exclusively to E-rate applicants.

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This Request for Review requests further consideration of the following USAC-SLD decisions:

FY2007 Funding Commitment Decision Letter (attached)	
Date of Letter	October 17, 2007
Applicant	Lexington County School District Two
Billed Entity Number	127142
Form 471 Application Number	566958
Funding Request Number	1565004
Funding Request Number	1565071
Funding Request Number	1565129
Funding Request Number	1565160
Funding Request Number	1565224
Funding Request Number	1565291
Funding Request Number	1565337
Funding Request Number	1565395
Funding Request Number	1565437
Funding Request Number	1565485
Funding Request Number	1565546

The "Funding Commitment Decision" listed in the Funding Commitment Decision Letter is: "\$0.00 – Ineligible Services/Products".

The "Funding Commitment Decision Explanation" given in the Funding Commitment Decision Letter includes: "DR1: 30% or more of this FRN includes a request for Novell SLA as Basic Maintenance of Internal Connections which is an ineligible product(s)/service(s) in the Basic Maintenance service category based on program rules."

Grounds for Appeal

We appeal this decision on grounds that USAC-SLD is erroneously treating this product as a Client Access License (CAL), when it is in fact a one year software maintenance contract for the required network operating software.

History

The applicant applied for the annual Novell SLA coverage as Basic Maintenance of Internal Connections. PIA reviewers notified the applicant that the FRN's were being re-categorized as Internal Connections and requested that the applicant agree to the re-categorization. The applicant refused to agree and subsequently was informed that they were requesting funding for an ineligible product/service and that the FRN would be denied funding.

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Discussion

A Google search for "Client Access License" "CAL" on this date yielded a multitude of Microsoft technical bulletins and two definitions, one from Wikipedia:

A Client Access License (CAL) is a kind of license that allows client machines to connect to Microsoft server software.

And one from Webopedia:

Short for client access license, CAL is a <u>license</u> that gives a user the right to access the services of the <u>server</u>. CALs are primarily used for <u>Microsoft</u> Server products where the CAL is based on a per seat licensing (also called per user or per device), per server licensing, per processor licensing, or per mailbox licensing.

The FRN's discussed herein requested discounts on a Novell School License Agreement ("SLA") for the required Novell server network operating systems. The pricing of this agreement is based on the number of students enrolled (for instance \$2.50 per student enrolled for the Funding Year), and is <u>not</u> based on the number of users of the system. The SLA does not control the number of users of the system. For instance, for an applicant that has an enrollment of 1000, the price is the same whether there are 10 authorized users/clients, or 10,000. The SLA does not control access to the system in any way. The SLA does not limit the number of simultaneous logins (client access) to the system.

It is apparent that SLD reviewers are treating the SLA as a purchase of client access licenses ("CALs"). That is not the case. The SLA has no effect on access to the system. The applicant already owns the required network operating systems that are supported by the Novell SLA and the applicant's systems will continue to operate as owned by the applicant whether the applicant purchases the SLA agreement or not.

The purpose of the SLA is to provide software maintenance and upgrade protection for the required network operating systems. As such, the SLA is necessary to the operation of the internal connections network. As such, the SLA is clearly being purchased as basic maintenance.

In order to ensure the necessary and continued operation (for its intended purpose, and with the degree of reliability ordinarily provided in the marketplace) of a Novell internal network, the applicant must purchase the Novell SLA each and every year for the required network operating systems that they already own.

In comparison, for illustration purposes, the Novell SLA is the exact equivalent of the Cisco SmartNet agreements which are deemed eligible by USAC-SLD as basic maintenance.

This issue is particularly critical to the applicant because of the "2 out of 5 year rule". If this funding decision is allowed to stand, then the applicant would be prevented, in 3 out of each 5 years, from funding maintenance that is necessary to ensure the continued operation of eligible internal connections components at the applicant's eligible locations.

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We believe that this issue arises because USAC-SLD has erroneously identified the SLA as CAL's (Client Access Licenses), and because the manufacturer Novell has been inept and ineffectual in correcting the USAC-SLD error. These errors result in unintended consequences of hardship and inequity for the students and teachers in this District.

We all thank you for your kind attention to this matter. Please contact me if you have any questions or need additional information.

Sincerely Service Associates Inc

Tom Traywick, J

Senior Compliance Analyst

Attachments: USAC-SAD Funding Commitment Letter dated October 17, 2007





Schools and Libraries Division

FUNDING COMMITMENT DECISION LETTER (Funding Year 2007: 07/01/2007 - 06/30/2008)

October 17, 2007

LEXINGTON COUNTY SCHOOL DIST 2 715 9TH ST WEST COLUMBIA, SC 29169-7169

Re: Form 471 Application Number: 566958
Billed Entity Number (BEN): 127142
Billed Entity FCC RN: 0005463195
Applicant's Form Identifier: NOVELLY10

Thank you for your Funding Year 2007 application for Universal Service Support and for any assistance you provided throughout our review. The current status of the funding request(s) in the Form 471 application cited above and featured in the Funding Commitment Report(s) (Report) at the end of this letter is as follows.

- The amount, \$8,114.41 is "Denied."

Please refer to the Report on the page following this letter for specific funding request decisions and explanations. The Universal Service Administrative Company (USAC) is also sending this information to your service provider(s) so preparations can begin for implementing your approved discount(s) after you file FCC Form 486, Receipt of Service Confirmation Form. A guide that provides a definition for each line of the Report is available in the Reference Area of our website.

NEXT STEPS

- Work with your service provider to determine if you will receive discounted bills or if you will request reimbursement from USAC after paying your bills in full
- Review technology planning approval requirements Review CIPA requirements

- File Form 486
- Invoice USAC using the Form 474 (service provider) or Form 472 (Billed Entity) as products and services are being delivered and billed

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

- 1. Include the name, address, telephone number, fax number, and (if available) email address for the person who can most readily discuss this appeal with us.
- 2. State outright that your letter is an appeal. Include the following to identify the letter and the decision you are appealing: - Appellant name,

- Applicant name and service provider name, if different from appellant, Applicant BEN and Service Provider Identification Number (SPIN), Form 471 Application Number 566958 as assigned by USAC, "Funding Commitment Decision Letter for Funding Year 2007," AND The exact text or the decision that you are appealing.

- 3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence

and documentation.

- 4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
- 5. Provide an authorized signature on your letter of appeal.

To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.org. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542.

To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal Schools and Libraries Division - Correspondence Unit 100 South Jefferson Road P.O. Box 902 Whippany, New Jersey 07981

You have the option of filing an appeal with the SLD or directly with the Federal Communications Commission (FCC). You should refer to CC Docket No. 02-6 on the first page of your appeal to the FCC. Your appeal must be received by the FCC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. We strongly recommend that you use the electronic filing options described in the "Appeals Procedure" posted in the Reference Area of our website. If you are submitting your appeal via United States Postal Service, send to: FCC, Office of the Secretary, 445 12th Street SW, Washington, DC 20554.

NOTICE ON RULES AND FUNDS AVAILABILITY

Applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with all such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds. The timing of payment of invoices may also be affected by the availability of funds based on the amount of funds collected from contributing telecommunications companies.

Schools and Libraries Division Universal Service Administrative Company

FCDL/Schools and Libraries Division/USAC

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958
Funding Request Number: 1565004
Funding Status: Not Funded
Category of Service: Basic Maintenance of Internal Connection
Form 470 Application Number: 329740000469358
SPIN: 143004863
Service Provider Name: Novell, Inc.
Contract Number: 05-S6610
Billing Account Number: 8037394084
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2007
Service End Date: N/A
Contract Award Date: 07/101/2007
Service End Date: N/A
Contract Award Date: 09/13/2009
Site Identifier: 30374
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$956.76
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$956.76
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.01 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

FCDL/Schools and Libraries Division/USAC

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958
Funding Request Number: 1555071
Funding Status: Not Funded
Category of Service: Basic Maintenance of Internal Connection
Form 470 Application Number: 329740000469358
SPIN: 143004863
Service Provider Name: Novell, Inc.
Contract Number: 05-56610
Billing Account Number: 8037394084
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2007
Service End Date: N/A
Contract Award Date: 07/24/2004
Contract Expiration Date: b9/13/2009
Site Identifier: 30376
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$804.36
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$804.35
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision Explanation: MR1: FRN modified in accordance with a RAL request. <><><>><>< MR2: The FRN was modified from \$43.94/m to \$67.03/m to agree with the applicant documentation. <><><><>><><> MR2: The FRN was modified from \$43.94/m to \$67.03/m to agree with request for Novell SLA as Basic Maintenance of Internal Connections which is an ineligible product(s)/service(s) in the Basic Maintenance service category based on program rules.

FCDL Date: 10/17/2007

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

FCDL/Schools and Libraries Division/USAC

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958
Funding Request Number: 1565129
Funding Status: Not Funded
Category of Service: Basic Maintenance of Internal Connection
Form 470 Application Number: 329740000469358
SFIN: 143004863
Service Provider Name: Novell, Inc.
Contract Number: 05-86610
Billing Account Number: N/A
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2007
Service End Date: N/A
Contract Award Date: 07/24/2004
Contract Expiration Date: 09/13/2009
Site Identifier: 30377
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$942.48
Annual Pre-discount Amount for Eligible Non-recurring Charges: 5.00
Pre-discount Amount: \$942.48
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.01 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision Explanation: MR1: FRN modified in accordance with a RAL
request for Novell SLA as Basic Maintenance of Internal Connections which is an
ineligible product(s)/service(s) in the Basic Maintenance service category based on
program rules.

FCDL Date: 10/17/2007

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958
Funding Request Number: 1565160
Funding Status: Not Funded
Category of Service: Basic Maintenance of Internal Connection
Form 470 Application Number: 329740000469358
SFIN: 143004863
Service Provider Name: Novell, Inc.
Contract Number: 05-5610
Billing Account Number: 8037394084
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2007
Service End Date: N/A
Contract Award Date: 07/24/2004
Contract Expiration Date: 09/13/2009
Site Identifier: 30610
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$732.96
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$732.96
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision Explanation: MR1: FRN modified in accordance with a RAL request. <><><>> NR2: The FRN was modified from \$40.04/m to \$61.08/m to agree with the applicant documentation. <><><>>>>>>>> NR1: 30% or more of this FRN includes a request for Novell SLA as Basic Maintenance of Internal Connections which is an ineligible product(s)/service(s) in the Basic Maintenance service category based on program rules.

FCDL Date: 10/17/2007

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958
Funding Request Number: 1565224
Funding Status: Not Frunded
Category of Service: Basic Maintenance of Internal Connection
Form 470 Application Number: 329740000469358
SPIN: 143004863
Service Provider Name: Novell, Inc.
Contract Number: 05-56610
Billing Account Number: 8037394084
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2007
Service End Date: N/A
Contract Award Date: 07/24/2004
Contract Expiration Date: D9/13/2009
Site Identifier: 30612
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$730.56
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$00
Pre-discount Amount: \$730.56
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision Explanation: MR1: FRN modified in accordance with a RAL request. <><><><><><><><>> DR1: 30% or more of this FRN includes a request for Novell SLA as Basic Maintenance of Internal Connections which is an ineligible product(s)/service(s) in the Basic Maintenance service category based on program rules.

FCDL Date: 10/17/2007

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958
Eunding Request Number: 1565291
Funding Status: Not Funded
Category of Service: Basic Maintenance of Internal Connection
Form 470 Application Number: 329740000469358
SPIN: 143004863
Service Provider Name: Novell, Inc.
Contract Number: 05-56610
Billing Account Number: 8037394084
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2007
Service End Date: N/A
Contract Award Date: 07/24/2004
Contract Expiration Date: 09/13/2009
Site Identifier: 30614
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$921.00
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$921.00
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: Explanation: MR1: FRN modified in accordance with a RAL request <><>><> MR2: The FRN was modified from \$50.31 to \$76.75/m to agree with the applicant documentation. <><><>><> PR1: 30% or more of this FRN includes a request for Novell SLA as Basic Maintenance of Internal Connections which is an ineligible product(s)/service(5) in the Basic Maintenance service category based on program rules.

FCDL Date: 10/17/2007

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958
Funding Request Number: 156537
Funding Status: Not Funded
Category of Service: Basic Maintenance of Internal Connection
Form 470 Application Number: 329740000469358
SPIN: 143004863
Service Provider Name: Novell, Inc.
Contract Number: 05-S6610
Billing Account Number: 8037394084
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2007
Service End Date: N/A
Contract Award Date: 07/24/2004
Contract Expiration Date: 09/13/2009
Site Identifier: 30618
Number of Months Recurring Service Provided in Funding Year; 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$1,463.64
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$1,463.64
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Fann Sf9.95/m to \$121.97/m to agree
with the applicant documentation. <>><>><>><>>>>> NSCOUNT To Novell SLA as Basic Maintenance of Internal Connections which is an ineligible product(s)/service(s) in the Basic Maintenance service category based on program rules.

FCDL Date: 10/17/2007

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958
Runding Request Number: 1565395
Funding Status: Not Funded
Category of Service: Basic Maintenance of Internal Connection
Form 470 Application Number: 329740000469358
SPIN: 143004663
Service Provider Name: Novell, Inc.
Contract Number: 8037394084
Multiple Billing Account Numbers: N
Service Start Date: 07/01/2007
Service End Date: N/A
Contract Award Date: 07/24/2004
Contract Expiration Date: 09/13/2009
Site Identifier: 30624
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$982.92
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$982.92
Discount Percentage Approved by the USAC: 80%
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision: \$0.00 - Ineligible Services/Products
Funding Commitment Decision Explanation: MR1: FRN modified in accordance with a RAL request. <><><>><><<>>><> RR1: 30% or more of this FRN includes a request for Novell SiA as Basic Maintenance of Internal Connections which is an ineligible product(s)/service(s) in the Basic Maintenance service category based on program rules.

FCDL Date: 10/17/2007

FCDL Date: 10/17/2007
Wave Number: 024
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

FCDL/Schools and Libraries Division/USAC

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

Comment on RAL corrections: The applicant did not submit any RAL corrections.

Form 471 Application Number: 566958

Funding Request Number: 1565437

Funding Status: Not Funded
Category of Service: Basic Maintenance of Internal Connection

Form 470 Application Number: 329740000469358

SFIN: 143004863

Service Provider Name: Novell, Inc.
Contract Number: 8037394084

Multiple Billing Account Numbers: N

Service Start Date: 07/01/2007

Service End Date: N/A

Contract Award Date: 07/24/2004

Contract Expiration Date: 09/13/2009

Site Identifier: 30625

Number of Months Recurring Service Provided in Funding Year: 12

Annual Pre-discount Amount for Eligible Recurring Charges: \$1,087.56

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$000

Pre-discount Amount \$1,087.56

Discount Percentage Approved by the USAC: 80%

Funding Commitment Decision: \$0.00 - Ineligible Services/Products

Funding Commitment Decision Explanation: MR1: FRN modified in accordance with a RAL request .<>>>>>> MR2: The FRN was modified from \$59.41/m to \$90.63/m to agree with the applicant documentation. .<>>>>>>>>> NR1: 30% or more of this FRN includes a request for Novell SLA as Basic Maintenance of Internal Connections which is an ineligible product(s)/service(s) in the Basic Maintenance service category based on program rules.

FCDL Date: 10/17/2007

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

FCDL/Schools and Libraries Division/USAC

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

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Comment on RAL corrections: The applicant did not submit any RAL corrections.

FCDL Date: 10/17/2007 Wave Number: 024 Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2008

FCDL/Schools and Libraries Division/USAC

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LEXINGTON 2

16:31



Schools and Libraries Division Correspondence Unit 100 South Jefferson Road P.O. Box 902 Whippany, NJ 07981

TIME SENSITIVE MATERIAL

00019
Carl Lam
LEXINGTON COUNTY SCHOOL DIST 2
715 9TH ST
WEST COLUMBIA, SC 29169-7169